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VIA EMAIL ONLY

Hon. Aida Camacho-Welch, Secretary New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor Post Office Box 350 Trenton, NJ 08625-0350 aida.camacho@bpu.nj.gov board.secretary@bpu.nj.gov

Re: In the Matter of the New Jersey Board of Public Utilities' Response to

the COVID-19 Pandemic BPU Docket No. AO20060471

Dear Secretary Camacho-Welch:

Please accept this letter filing as the preliminary plan ("Plan") submitted on behalf of Aqua New Jersey, Inc. ("Aqua" or the "Company") in the above-referenced proceeding. The Company's Plan is provided in compliance with the Order of the New Jersey Board of Public Utilities (the "Board") dated September 14, 2021 ("September 14th Order") in this docket. In the September 14th Order, the Board granted a request to extend the regulatory asset period, which will now run through December 31, 2022. Aqua was among the utilities that supported an extension of the regulatory asset period, and appreciates the Board's willingness to grant an extension in recognition of the continuing challenges presented by the COVID-19 pandemic.

In addition to the extension of the regulatory asset period, the September 14th Order directed public utilities to file a plan "outlining how the additional time afforded by . . . [the] Order will be used in meeting the Regulatory Asset Period deadline." The Board did not provide any direction as to what elements were to be addressed in utility plans, thereby providing companies with flexibility to respond in a manner that is appropriate for each utility.

¹ The Board's Order became effective on September 21, 2021 and directed that the Company make this filing within ten days of the Order's effective date (i.e., October 1, 2021).

² See September 14th Order at 6.

As an initial matter, Aqua notes that this letter will serve as its preliminary Plan in response to the September 14th Order. The issue of customer arrearages is complex and does not lend itself to a response prepared in isolation or with limited time. Instead, Aqua will continue to refine and review its Plan in order to identify strategies that can help to address arrearages. Further, water and wastewater providers have not had access to the broad-based customer assistance programs common in the energy sector, a fact that creates its own challenges. That said, Aqua is of the view that customer education is, and will be, critical to providing assistance to customers. Aqua is in the early stages of considering how best to provide customers with information about available assistance programs and tools. As the Company refines its plans, it will supplement this response. In the interim, Aqua's Plan includes the following steps:

- 1. Aqua will continue to cooperate fully with the Department of Community Affairs and the Board as the new Low Income Household Water Assistance Program ("LIHWAP") is finalized and implemented. This program represents an important source of federal funds to assist New Jersey customers with water bills, and Aqua stands ready to assist in the implementation of the program. Aqua will prominently display information regarding LIHWAP on its website as the program is implemented and information becomes available.
- 2. Aqua has created and posted on its website a new customer assistance program called Aqua Aid. Contact information is provided for customers seeking assistance with over-due water bills.
- 3. Aqua will continue to provide deferred payment arrangement options of at least 12 months to residential customers, without penalties, late fees, interest or minimum deposits.
- 4. Aqua will continue to report to the Board regarding customer arrearage levels and regulatory asset levels.
- 5. Following the expiration of the grace period, Aqua will closely monitor the impact of deferred payment arrangements on customers and on bad debt levels.
- 6. Aqua will review the Plans of other utilities to identify possible best practices or strategies for implementation by the Company.

In closing, this letter filing represents the Company's Plan at this point in time. Aqua intends to supplement this Plan in the coming weeks and will provide its revised and updated Plan to the Board at that time. Finally, Aqua appreciates the Board's attention to this critical issue and looks forward to working collaboratively with the Board in these unprecedented times.

Respectfully submitted,

Colleen A. Foley, Esq.

Collen A. Toley

Counsel for Aqua New Jersey, Inc.

Cc: Email service list